

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

MARY QUESENBERRY, PAUL E.  
HOLLANDSWORTH, WALTER E. VIERS,  
CURTIS L. COX, ROBERT K. GOAD,  
SHIRLEY I. TOLBERT, on behalf of  
themselves and all others similarly situated;  
INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE, AND  
AGRICULTURAL IMPLEMENT WORKERS  
OF AMERICA; and UAW LOCAL UNION  
2069,

Plaintiffs,

v.

VOLVO GROUP NORTH AMERICA, INC.  
f/k/a VOLVO TRUCKS NORTH AMERICA,  
INC. and VOLVO TRUCKS NORTH  
AMERICA RETIREE HEALTHCARE  
BENEFIT PLAN,

Defendants.

Judge James P. Jones

Magistrate Judge Pamela Meade Sargent

Civil Action No. 1:09-cv-00022

**LIST OF EXHIBITS PLAINTIFFS EXPECT TO OR MAY OFFER**

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
1			1978 Collective Bargaining Agreement		VOL00000825-860		
2		Y	1978 Supplemental Agreements (including Benefits)	70	VOL00000861-1002		
3			1981 Collective Bargaining Agreement		PL0003125-3198		
4		Y	1981 Benefits Insert	71	PL0014780		
5			1984 Collective Bargaining Agreement		VOL00001041-1079		
6		Y	1984 Benefits Booklet	95	VOL00001080-00001100		
7			1987 Collective Bargaining Agreement		VOL00001101-00001148		
8		Y	1987 Benefits Booklet		PL0004918-0004944		
9			1991 Collective Bargaining Agreement		PL0003418-3468		
10		Y	1991 Benefits Booklet		PL0003364-3391		
11			1994 Collective Bargaining Agreement		PL0003835-3875		
12		Y	1994 Benefits Booklet	72	PL0002751-2796		
13		Y	1994 Pension Plan		Exh. 45 to Pls.' Mot. for Summ. J.		

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
14		Y	1999 Collective Bargaining Agreement for Production and Maintenance Employees (including Benefits)	51	None		
15			1999 Collective Bargaining Agreement for Salaried Employees (including Benefits)		PL0003275-3363		
16		Y	1999 Pension Plan		PL0014784-14855		
17			2005 Collective Bargaining Agreement (Production & Maintenance and Salaried Employees)		PL0004132-4344		
18		Y	2005 Benefits Agreement (Production & Maintenance & Salaried Employees)		PL0003611-0003741		
19			2008 Collective Bargaining Agreement (Production & Maintenance and Salaried Employees)		PL0003742-3834		
20		Y	Employee Benefits for Represented Employees		PL0002797-2840		
21		Y	September 3, 1985 Memorandum to Andy Anderson from David Hirschland		PL0010952-10955		
22		Y	NRV - Hourly Health and Welfare Plans (signed 12/1/87)	96	PL0008487-8539		

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
23		Y	Statement from UAW to Volvo GM Heavy Duty Truck - February 20, 1991 Benefit Proposals		PL0004857-4866		
24		Y	Handwritten Notes "Book #1 1991 Negotiations"	77	PL0001917-1923		
25		Y	Handwritten Notes: "Book #2 1991 Negotiations"	78	PL0001955-1969		
26		Y	Statement from UAW to Volvo GM Heavy Duty Truck - March 7, 1991 (9:00 p.m.) Benefit Proposals	80	PL0011024-11031		
27		Y	Company Settlement Proposal Economic Issues		PL00004830-4853		
28			Typed Notes (March 6)		VOL0005543-5547		
29			Benefit Proposal from Volvo-GM Heavy Truck Corporation: 3-7-94		PL00004797-4799		
30			Benefits Agreement, Health Care (signed 3-9-94)	88	PL0001331-1340		
31			How the Review Works		PL00004964-4965		
32			1994 Highlights of Proposed New Agreement	89	PL0001346-1361		
33		Y	August 6, 1998 Letter to Eula M. Jones from Volvo Human Resources (Melissa Jackson)	97	None		

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
34			Handwritten Notes (10/2/98)	102	PL0005229-5233		
35		Y	Handwritten Notes (10/19/98)	103	PL0005237-5238		
36		Y	Handwritten Notes (11/2/98)	105	PL0008312-8314		
37			Handwritten Notes	101	VOL00007522-7525		
38			Handwritten Notes (11/17/98)	106	PL0005223-5224		
39		Y	Confidential - Labor Contract, VTNA/UAW Negotiations	100	VOL00008732-33		
40			Handwritten Notes (12/2/98)	107	VOL00009003-00009008		
41		Y	Typed Notes (12/3/98)	49	VOL 7496-7502		
42		Y	Unpublished Letter, Retiree Health Care Caps	2	VOL00008701		
43		Y	Tentative Economic Agreement Between UAW/VTNA - P&M December 6, 1998	53	PL0001715-1723		
44		Y	Confidential - 1998 Negotiations, Basic Strategies	99	VOL00008850-8855		
45		Y	Employee Benefits Book Language Changes		PL0005209-5213		

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
46		Y	NEWS UAW: UAW Members Approve New Pacts with Volvo Trucks		PL0007793-7794		
47			Summary of 1999 Labor Agreement Between UAW/VTNA - P & M February 1, 1999	109	VOL00009148-9155		
48		Y	Documents for Miles Glenn Lee	45	None		
49			1999 Highlights of Proposed New Agreement	48	VOL 7634-7646		
50		Y	February 23, 2000 Letter to Walter I. McGrady from Volvo Human Resources (Vickie Corder)	98	None		
51			"Issue"		PL0005327-5328		
52			Oct. 23, 2001 Fax to Mike LaCour from John Sayers		PL0005323-5325		
53		Y	September 2004 Volvo Trucks North America, Inc. Postretirement Benefit Valuation Report (redacted)	92	VOL00006384-00006411		
54		Y	Oct. 15, 2004 Letter from Mercer re Data for New River Valley Negotiations	4	VOL00003614-3617		
55		Y	NRV CAP Approaches	12	VOL00008699-8700		

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56		Y	Volvo 2005 Labor Negotiations Benefit Strategy	6	LMP00004218 (25 pages)		
57		Y	UAW Welfare Plan Design Considerations	11	VOL00006897		
58			January 4, 2005 Email to Ed Rosko from Greg Tinnell	13	VOL00008795-96		
59		Y	Summary of Objectives	15	LMP00003978 (5 pages)		
60			Proposal to Change Benefits: Pension Plan 1/21/05 9:45 AM	17	PL0010300-10309		
61			Proposal to Change Benefits: Pension Plan 1/21/05 9:45AM "Working Copy"		PL0005917-5926		
62			Proposal to Change Benefits: Pension Plan 1/30/05 10:00 PM	19	VOL00007649-7675		
63			UAW Summary of 2005 Tentative Agreement (Highlights)	59	VOL00007365-7372		
64		Y	January 31, 2005 Email to C. Martinz from Joe Huxta		VOL00006521-6522		
65		Y	Summary of VTNA/UAW Negotiations 2/1/05 2:35 AM		PL0006856		
66		Y	Summary of VTNA/UAW Negotiations (with handwriting)		PL0008991		
67		Y	Tentative Agreement - Benefits 2/3/2005 11:44 AM	20	VOL00003558-3563		

Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
68		Y	February 3, 2005 Email to Willard Beck from Kaye McLeod	24	VOL00003551-3557		
69		Y	Tentative Agreement - Benefits 2/4/2005		PL0006843-6848		
70		Y	February 7, 2005 Email to C. Martinz, et al., from Kaye McLeod	21	VOL00003545-3549		
71			Tentative Agreement - Benefits 2/7/05 4 PM		PL0009460-9468		
72			February 14, 2005 Email to Kaye McLeod from Greg Tinnell	22	LMP00001689 (1 page)		
73		Y	UAW Members Vote Against 2 of 3 Tentative Agreements	93	PL0005786		
74		Y	Highlights of VTNA/UAW Tentative Agreement	26	VOL00003541-3544		
75		Y	NRV Hourly Employees Comparison of Current CIGNA PPO with Modified Trigon KeyCare 10 POS Plan		PL0007096-7100		
76		Y	Memorandum of Agreement		VOL00006517		
77			Feb. 28, 2005 Memorandum to All Volvo Truck North America UAW Bargaining Unit Employees from UAW	57	VOL0006571-6574		



Document	Trial Exhibit Number	Expect to Use	Brief Description	Deposition Exhibit Number	Bates Range	Offered By	Admitted into Evidence
78		Y	March 7, 2005 Letter from Mercer re NRV Negotiations	14	VOL00003536-37		
79			New Tentative Agreement - March 31, 2005		VOL0007687		
80			Summary of Benefits Agreement (signed 4/2/2005)	25	PL0005502-5512		
81		Y	April 7, 2005 Memorandum to Kjell Svenson from Greg Tinnell	94	VOL00006488-00006493		
82		Y	New River Valley UAW Labor Negotiations Update	28	LMP00003836 (5 pages)		
83		Y	Handwritten Notes (start 1/9/08)	33	VOL00008564-8675		
84			New River Valley Common & Supplemental Agreements - Executive Briefing	31	LMP00000030 (20 pages)		
85		Y	Handwritten Notes (start 1/26/08)	122	VOL00009553-9586		
86		Y	Feb. 1, 2008 Memorandum to William Waters, et al., from Jack Widman, et al.	32	VOL00002068-2079		
87			Feb. 5, 2008 Letter from Mercer re NRV Retiree Medical - Projection of VEBA Trust Funds		VOL000070-73		
88			Feb.7, 2008 Letter to the Members of UAW Local 2069 from Volvo Trucks North America	36	PL0002164-2165		

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89		Y	March 5, 2008 Email to Jeannene Lambert from Bruce Jennings	1	VOL00002262-2266		
90		Y	March 13, 2008 Letter to Jack Widman from Michael Saggau	38	PL0004528-4529		
91		Y	March 20, 2008 Letter to Michael Saggau from John Widman		none		
92			June 7, 2008 Email to Mike Saggau from John Widman	39	VOL00004356-4358		
93			2008 NRV Negotiation Summary (substantive changes only)	37	VOL00001942-1947		
94		Y	Dec. 31, 2008 Letter to Volvo-UAW Bargaining Unit Retirees re: Changes to Your Retiree Medical and Prescription Drug Coverages		PL0000004-0000010		
95			Volvo Truck NRV VEBA - Summary of Transactions		VOL00000093-94		
96		Y	Jan. 21, 2009 Letter to Volvo-UAW Bargaining Unit Retirees re: Retiree Prescription and Drug Plan, Postponement of Changes to the Medicare Eligible Plan		VOL00000006		

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97		Y	May 1, 2009 Letter to Volvo-UAW Bargaining Unit Retirees re: Changes to Your Retiree Medical and Prescription Drug Plan, Changes to the Medicare Eligible Plan Effective July 1, 2009		PL0000590-591		
98		Y	July 13, 2009 Letter to General Holiefeld from Per Carlsson		none		
99			Feb. 17, 2010 Letter to Lester Hancock from General Holiefeld		PL0014782-14783		

Respectfully submitted,

*s/ Julia Penny Clark*

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Date: February 23, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2010, I electronically filed the foregoing List of Exhibits Plaintiffs Expect To or May Offer with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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